

**From:** [Briana Kottke](#)  
**To:** [rosetta.sannicolas](mailto:rosetta.sannicolas) [REDACTED]  
**Subject:** 2nd Supplemental Discovery Request and Continued 1st Supplemental Discovery Request  
**Date:** Friday, February 19, 2021 1:27:00 PM

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Hi Rosetta,

In Ricky Santos's case, I am still missing all of the below from my First Supplemental Discovery Request propounded in October of 2020 with the exception of the Coast Guard Officer's hand-written notes and his CV. Everything else is still outstanding.

In addition to the below, I am now also requesting the grand jury proceeding in this case as well. Please let me know when I should expect these items. Four months has gone by since my initial supplemental discovery request, and I really need everything before we can proceed any further. If you want talk, I am on my cell phone today [REDACTED]

Thank you,

~Briana

Briana E. Kottke  
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**From:** Briana Kottke  
**Sent:** Monday, October 19, 2020 11:18 AM  
**To:** [rosetta.sannicolas](mailto:rosetta.sannicolas) [REDACTED] >  
**Subject:** Ricky Santos - Supplemental Discovery Request #1

Hi Rosetta,

I hope you are well and had a good weekend. Please consider this email my formal supplementary discovery request #1 in Ricky Santos's case CR 20-00092. In addition, I would like to schedule a time to review unredacted discovery at your convenience.

1. Handwritten notes of all officers/agents involved in this investigation;
2. Reports on clue spray analysis by law enforcement and all other missing documents relating to the arrest, questioning, and search of Mr. Santos's

**EXHIBIT D**

- person and house;
3. *Brady, Giglio, and Henthorn* materials regarding but not limited to: David Elliott, Henry James, Jan Dizon, Jeremiah Cruz, Jason Correa, Shawn Ayuyu, Any U.S. Coast Guard Officers involved (see Bates 340), Willie Hays, Nicholas Wellin;
  4. Any and all investigative reports resulting in the initial package being identified as “suspicious” and reports on related investigations. I am missing basically everything leading up to the day of the arrest and there may be exculpatory or mitigation evidence;
  5. If a K9 was used on any packages relating to this investigation, I need the K-9’s certifications, training and testing records, whether prey or play driven, the K9’s “tells” or “alerts”, and any other documents relating to the K-9 certifications or trainings;
  6. Any and all surveillance videos or photos on Ricky or his family members and 302s relating to this investigation as they may contain exculpatory or mitigation evidence;
  7. The lab results for DEA Exhibits 6-9, 12, and 14 as well as any other outstanding results not identified herein;
  8. The “60-days letters” for DEA exhibits 13 and 7;
  9. All missing chain of custody information relating to both drug and nondrug exhibits;
  10. All licenses and necessary certifications on the Celebrite or other software used to image or review phones seized during investigation;

Thanks in advance,

~Briana

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